REMARKS

- 1. The Examiner has maintained his obviousness objection to claim 6 on the basis of Misawa (US 5,282,044) in view of Watanabe (US 5,835,136).
- 2. In response, the Applicant submits that the following claimed features are absent from Misawa:
- (a) "a processor ... processing said sensed image under programme control utilising the velocity output to deblur said image and to output said deblurred image." Misawa discloses a "camera shake correction system" for a video camera. In order to correct shake in video cameras, Misawa discloses a combination of mechanical shake correction and electronic shake correction. In the mechanical shake correction, the image sensor itself is physically moved in the opposite direction to the shake effect (Col. 3, lines 35 to 51). In the electronic shake correction, the entire captured image is moved in the opposite direction to the shake effect (Col. 3, lines 35 to 51). There is no disclosure in Misawa of any processor which "deblurs" the image after it has been captured, as is claimed. The Misawa arrangement either moves the image sensor or moves the captured image, but does not deblur the captured image.

If the Misawa shake correction technique were applied to a captured image, then the mechanical and electronic shake correction methods would be likely to have the following effects respectively:

- (i) Mechanical shake correction: After a first image is captured, the image sensor in the camera is then moved in the direction opposite to the shake effect prior to a second image being taken at some time in the future. Such a solution would merely result in a slightly different view of the subject being photographed and would not deblur the first captured image.
- (ii) Electronic shake correction: After a first image is captured, the captured image stored in memory is shifted slightly in the direction opposite to the shake effect. Such a solution would merely result in a slight movement of the captured image and would not deblur the captured image.

Although the Misawa shake correction system may be effective in a video camera environment, it is not able to effect deblurring of a captured image, as is claimed.

- (b) "an integral inkjet printer means internal to said portable handheld camera device." The Misawa video camera arrangement does not have an integral printer. However, the Examiner has suggested that since Watanabe discloses a still image camera with a printer in it, it would be obvious to combine the two documents to produce the claimed invention. In response, the Applicant makes two points:
- (i) The printer disclosed in Watanabe is not an inkjet printer. The printer disclosed in the Watanabe arrangement is a thermal printer (see col. 1, line 8). There is no disclosure of any inkjet printer in Watanabe and the combination of Watanabe and Misawa therefore does not disclose all of the claimed features.
- (ii) Because Misawa's shake correction system is only applicable to a video camera environment there would be no point in combining Misawa's video camera system with Watanabe's still image printing camera. One of ordinary skill in the art at the time the invention was made would have no motivation to combine the two documents.
- 3. The Examiner further suggests that it would have been obvious for one of ordinary skill in the art at the time the invention was made to combine Misawa with Watanabe, with Nobuoka (US 5,986,698) and Galvin (US 6,199,874) to produce the invention claimed in claim 8. In response, the Applicant submits that it would not have been obvious to combine these four documents for the following reasons:
- (a) Misawa's shake correction system is only suitable for a video camera implementation and would not work in the still image camera systems of Watanabe and Nobuoka. There is therefore no motivation to combine Misawa with Watanabe and Nobuoka.
- (b) The Examiner has had to call upon four separate documents in order to allegedly anticipate all of the claimed features. The Applicant suggests that it would be difficult to argue that such a combination would have been obvious to one of ordinary skill in the art simply because of the number of documents involved.
- (c) Galvin discloses a microelectromechanical accelerometer for automotive applications. The Abstract states that the device "can be used for airbag deployment, active suspension control, active steering control, anti-lock braking, and other control systems requiring accelerometers having high sensitivity, extreme accuracy and resistance to out of plane forces." There is no suggestion in this list or anywhere in Galvin that the

accelerometer disclosed therein would be suitable for use as a velocity detector in a still image camera.

- 4. For these reasons, the Applicant submits that it would not have been obvious to one of ordinary skill in the art at the time the invention was made to produce the claimed invention via a combination of the cited documents. The Examiner is requested to reconsider and withdraw these obviousness objections.
- 5. The Applicant has made a number of minor changes to claims 6 and 7 in order to improve the clarity of the claims. These modifications have not been made in order to avoid the prior art.

-6-

CONCLUSION

It is respectfully submitted that all of the Examiner's objections have been successfully traversed. Accordingly, it is submitted that the application is now in condition for allowance. Reconsideration and allowance of the application is courteously solicited.

Very respectfully,

Applicant:

Un 52

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